

EXHIBIT G

ORIGINAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CLRB HANSON INDUSTRIES, LLC,)	
etc., et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No.
)	05-03639 JW
GOOGLE, INC.,)	
)	
)	
Defendant.)	
_____)	

30(b) (6) DEPOSITION OF BRETT R. HANSON

August 18, 2006

228010

BARKLEY
Court Reporters

(310) 207.8000 Los Angeles	(916) 922.5777 Sacramento	(818) 702.0202 San Fernando Valley
(949) 955.0400 Orange County	(408) 885.0550 San Jose	(858) 455.5444 San Diego
(415) 433.5777 San Francisco	(951) 686.0606 Inland Empire	(760) 322.2240 Palm Springs

1
2 UNITED STATES DISTRICT COURT
3 NORTHERN DISTRICT OF CALIFORNIA
4 SAN JOSE DIVISION

5 -----x
6 CLRB HANSON INDUSTRIES, LLC d/b/a
7 INDUSTRIAL PRINTING, and HOWARD
8 STERN, on behalf of themselves and
9 all others similarly situated,

10 Plaintiffs,

11 v.

Case No.
05-03639 JW

12 GOOGLE, INC.,

Confidential
Portions Bound
Separately

13 Defendant.

14 -----x

15 August 18, 2006

16 9:45 a.m.

17 30(b)(6) VIDEOTAPED DEPOSITION

18 of CLRB HANSON INDUSTRIES d/b/a
19 INDUSTRIAL PRINTING by BRETT R. HANSON,
20 taken by Defendant, pursuant to notice,
21 held at the offices of Thacher Proffitt
22 & Wood, 2 World Financial Center, New
23 York, New York, before Amy E. Sikora,
24 CRR, CSR, RPR, Certified Realtime
25 Reporter, Certified Shorthand Reporter,
Registered Professional Reporter, and
Notary Public within and for the State
of New York.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

A P P E A R A N C E S:

WOLF POPPER LLP

Attorneys for Plaintiffs and the Proposed Class

845 Third Avenue

New York, New York 10022

BY: LESTER L. LEVY, ESQ.

MICHELE F. RAPHAEL, ESQ.

PERKINS COIE LLP

Attorneys for Defendant

180 Townsend Street

San Francisco, CA 94107-1909

BY: DAVID T. BIDERMAN, ESQ.

M. CHRISTOPHER JHANG, ESQ.

ALSO PRESENT:

THOMAS DELVECCHIO, Videographer

1 B. Hanson

0:18 2 Q. Okay. In other words, you don't
0:18 3 recall ever seeing it on the Google site in
0:18 4 whole or in part?

0:18 5 A. I remember -- I remember being
0:18 6 attracted to the value proposition of
0:18 7 controlling my daily budget, controlling my
0:18 8 clicks per day, controlling my cost per
0:18 9 click. Having the ability to turn off and on
0:18 10 the campaign. And those were the selling
0:18 11 features that brought me and convinced me to
0:18 12 use Google.

0:18 13 Q. Right. But my question was a
0:19 14 different one. My question was, once you
0:19 15 decided you were going to use Google, did you
0:19 16 ever see the terms and conditions, either in
0:19 17 the form that I've handed to you or any other
0:19 18 form?

0:19 19 A. Not that I can -- not that I can
0:19 20 recall.

0:19 21 Q. And do you recall that when you
0:19 22 signed up for the AdWords program the first
0:19 23 time on behalf of Industrial Printing that
0:19 24 there was at some point in time, in
0:19 25 connection with the sign-up process, you

1 B. Hanson

.1:27 2 interrupt you? And what -- what caused you
.1:27 3 to use the pausing feature?

.1:27 4 A. It's a unique selling feature
.1:27 5 allowing you to turn off and on your costs.
.1:27 6 Having more ability to control the costs
.1:27 7 associated with your pay-for-click
1:27 8 advertising. I thought that was an asset of
1:27 9 Google's that others did not have.

1:27 10 Q. Okay. And what did you use the
1:27 11 pausing feature to accomplish?

1:27 12 A. That was my cost certain. If I
1:27 13 had a daily budget of \$100 and my costs at
1:27 14 that certain time were -- were, as an
1:27 15 example, \$52 to my \$100 budget, I wasn't
1:27 16 going to spend more than \$52 that day,
1:28 17 period.

1:28 18 Q. So could you give me an example
1:28 19 of how you would implement that pausing?

1:28 20 A. Just go in and click. There's a
1:28 21 button that says, "Pause."

1:28 22 Q. Okay. But you said you'd look
1:28 23 at your billing summary; right?

1:28 24 A. Look at my daily budget, that's
1:28 25 on one page. You've got your campaign name,